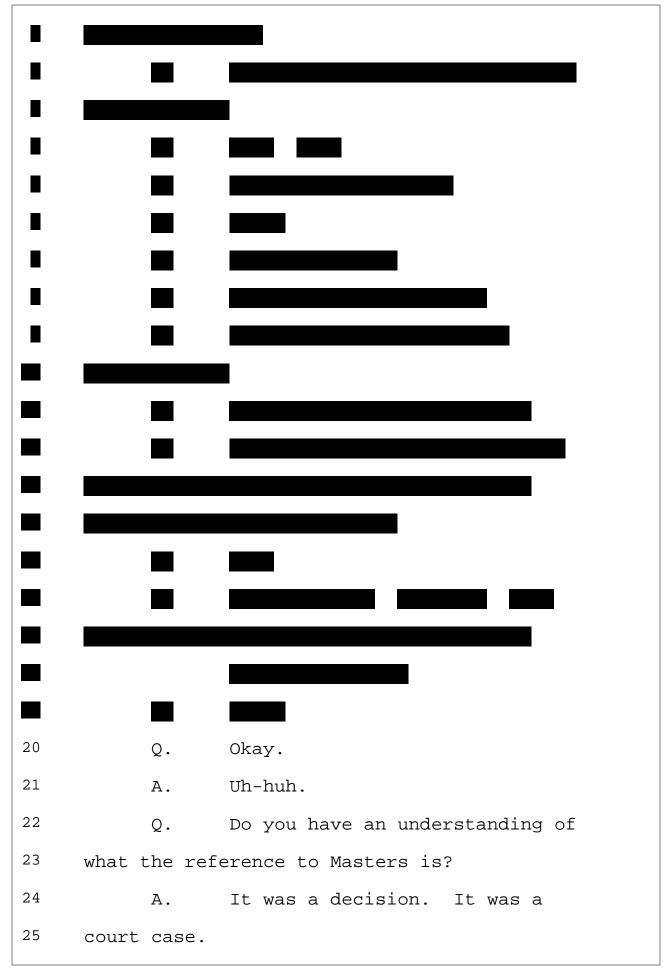
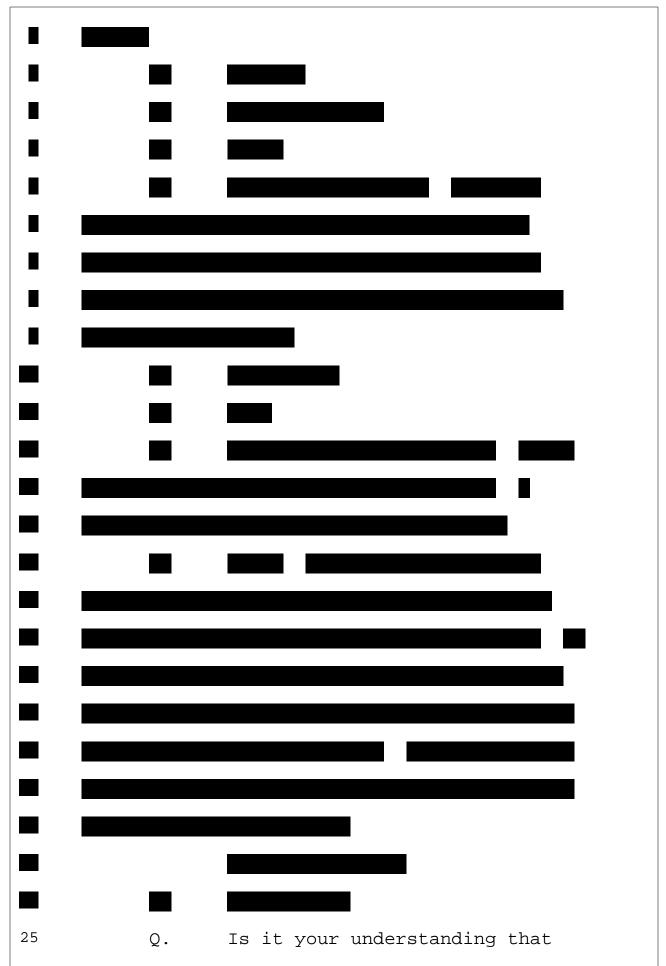
PSJ4 SOL Opp App A Exh 9

```
1
              UNITED STATES DISTRICT COURT
            FOR THE NORTHERN DISTRICT OF OHIO
 2
                    EASTERN DIVISION
                                    MDL No. 2804
 3
    IN RE: NATIONAL
    PRESCRIPTION OPIATE
 4
    LITIGATION
                                    Case No.
                                    1:17-MD-2804
 5
                                ) Hon. Dan A. Polster
    THIS DOCUMENT RELATES TO
 6
    ALL CASES
 7
 8
 9
10
               Thursday, February 14, 2019
11
12
       HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
                 CONFIDENTIALITY REVIEW
13
14
15
16
17
            Videotaped Deposition of BILL BRANDT,
     held at Locke Lord LLP, 2200 Ross Avenue,
     Suite 2800, Dallas, Texas, commencing at
18
     9:07 a.m., on the above date, before
     Michael E. Miller, Fellow of the Academy of
19
     Professional Reporters, Registered Diplomate
     Reporter, Certified Realtime Reporter and
20
     Notary Public.
21
22
23
24
                GOLKOW LITIGATION SERVICES
             877.370.3377 ph | fax 917.591.5672
25
                     deps@golkow.com
```



A court decision, right? 1 Q. 2 Α. A court decision, that's right. Regarding the reporting of 3 Q. 4 suspicious orders of controlled substances, 5 correct? That's my understanding, yes. 6 Α. 12 Q. Did you have any discussions 13 with Mr. Abreu about the Masters decision 14 around that time, June of 2018? 15 I'm sure we did, yeah. I'm Α. 16 sure we had discussions. 17 Why? Why are you sure that you Q. 18 had discussions? 19 It was a relevant -- it was a 20 relevant change and, yeah, I remember 21 discussions with Shaun and with Jim and 22 regulatory to try to figure out how we were 23 going to comply and do what we needed to do.



- prior to October 2017, Henry Schein was not
- 2 reporting orders when discovered --
- 3 suspicious orders when discovered to the DEA?
- 4 MR. JONES: Object to the form.
- 5 A. Yeah, I don't know the exact
- date that we changed, but we did change. I
- 7 just don't know the date that we formally
- 8 did -- made that change.
- 9 BY MR. ACKERMAN:
- 10 O. Would Shaun Abreu have been
- more knowledgeable about the date that
- 12 Henry Schein made that change?
- 13 A. Yes, I'm sure he would be.
- Q. So if in October 2017, Shaun
- 15 Abreu writes we should start reporting orders
- when discovered as a result, does that
- indicate to you that at that time,
- 18 Henry Schein was not reporting suspicious
- orders when discovered to the DEA?
- 20 A. I guess --
- MR. JONES: Object to form.
- 22 A. I don't know. I don't know if
- we were or not at that time.
- 24 BY MR. ACKERMAN:
- 25 Q. Okay.

- 1 A. Yeah.
- Q. Sitting here today do you know
- when Henry Schein reports suspicious orders
- 4 to the DEA?
- A. When we do?
- O. Yes.
- 7 A. Yes.
- 8 O. When?
- 9 A. When it pends, when the order
- pends prior to us doing our due diligence.
- 11 Q. And how is it that you were
- aware of the procedure now? How did you
- become aware of that procedure?
- 14 A. Because it required additional
- resource and just working with Shaun and
- 16 regulatory to make sure that we were in
- compliance with the Masters ruling.
- 18 Q. How did it require additional
- 19 resource?
- 20 A. Just more people for the
- letters. We have to generate letters and
- mail them to the local offices, I believe,
- now.
- Q. So were you involved in -- I
- assume it's hiring more people or bringing

- 1 more people on to the verifications
- department for that process?
- A. I was -- yeah, I probably
- 4 worked with Shaun to figure out how we were
- 5 going to do that.
- 6 Q. And in what time frame did that
- 7 effort occur?
- 8 A. It looks probably 2017
- 9 sometime. Again, I don't know the exact
- 10 date.

- 16 Q. How many more people did the
- verification department add in order to
- effect this change in the manner in which
- 19 Henry Schein was reporting suspicious orders
- to the DEA?
- 21 A. I don't remember exactly what
- we did. I don't remember if we brought
- somebody new or if we changed a role of an
- existing person that -- it may have been
- something to do with that, yeah. And I know

```
1
                       CERTIFICATE
 2
                 I, MICHAEL E. MILLER, Fellow of
     the Academy of Professional Reporters,
 3
     Registered Diplomate Reporter, Certified
     Realtime Reporter, Certified Court Reporter
     and Notary Public, do hereby certify that
 4
     prior to the commencement of the examination,
     BILL BRANDT was duly sworn by me to testify
 5
     to the truth, the whole truth and nothing but
 6
     the truth.
 7
                 I DO FURTHER CERTIFY that the
     foregoing is a verbatim transcript of the
     testimony as taken stenographically by and
 8
     before me at the time, place and on the date
 9
     hereinbefore set forth, to the best of my
     ability.
10
                 I DO FURTHER CERTIFY that pursuant
     to FRCP Rule 30, signature of the witness was
11
     requested by the witness or other party
12
     before the conclusion of the deposition.
13
                 I DO FURTHER CERTIFY that I am
     neither a relative nor employee nor attorney
     nor counsel of any of the parties to this
14
     action, and that I am neither a relative nor
15
     employee of such attorney or counsel, and
     that I am not financially interested in the
16
     action.
17
18
     MICHAEL E. MILLER, FAPR, RDR, CRR
19
     Fellow of the Academy of Professional Reporters
     NCRA Registered Diplomate Reporter
20
     NCRA Certified Realtime Reporter
     Certified Court Reporter
21
     Notary Public in and for the
     State of Texas
22
     My Commission Expires: 7/9/2020
23
     Dated: 19th day of February, 2019
24
25
```